**Question:**

Did the deaverage wire center lists that Qwest gave the DoJ rely upon the FCC's Synthesis Model (which appears to have errors)? Or, are the wire centers from Qwest records and reflect the existing wire centers correctly (i.e., sold wire centers are removed)?

**Answer:**

The list of wire centers included in each of Qwest's deaveraged UNE pricing zones, which Qwest previously provided to the DoJ, did not rely upon the FCC Synthesis Model. Qwest has rechecked the information that it provided to DOJ regarding these wire centers and filed as an ex parte in the record of WC Docket No. 02-148 on June 18, 2002. That information is correct.

**Question:**

Which of the five SGATs filed has 30 day Held Order process language in section 9.2.2?

**Answer:**

The 30 Day Held Order process appears in the Colorado and Iowa SGATs in section 9.2.2.16. This language does not appear in the Idaho, Nebraska, and North Dakota SGATs, but will be included in these SGATs and in all other jurisdictions as updated SGATS are filed in the normal course of business. However, it is currently our policy in all 14 states to follow the process set forth in the Colorado and Iowa SGATs. Attached is the notification letter sent through the change management process on May 16, 2002, notifying the CLEC's of the updated documentation related to the 30 day hold process specifically for unbundled loops, which is the UNE that is of most interest to the CLECs. Qwest is currently in the process of updating the remaining UNE product catalogs with this same 30 day hold policy.

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# Qwest

| | |
|---|---|
| **Announcement Date:** | May 16, 2002 |
| **Effective Date:** | May 17, 2002 |
| | |
| **Document Number:** | PROD.05.16.02.F.00760.Unbundled_Local_Loop |
| **Notification Category:** | Product Notification |
| **Target Audience:** | CLECs, Resellers |
| | |
| **Subject:** | CMP – Unbundled Local Loop – General Information |
| | |
| **Level of Change:** | Level 1 |
| **Associated CR#:** | NA |

**Summary of Change:**
On May 17, 2002, Qwest will post updates to its Wholesale Product Catalog that includes updated documentation for Unbundled Local Loop – General Information. This material becomes effective on May 17, 2002.

The PCAT updates will include information regarding the spare facilities process and updates to the fields found on the LSR. Also, updated training information will be included in the revised PCAT.

You will find a summary of these updates on the attached Web Change Notification Form. Actual updates to the operational document are found on the Qwest Wholesale Web site at this URL:
http://www.qwest.com/wholesale/pcat/unloop.html.

**Comment Cycle:**
No formal comment cycle applies. If you have any questions on this subject, please submit comments to the CMP Manager at cmpcr@qwest.com.

Sincerely,

Qwest

**Note:** In cases of conflict between the changes implemented through this notification and any CLEC interconnection agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party to such interconnection agreement.

Att. 17-A

Qwest

# WEB CHANGE NOTIFICATION FORM:

**Attention:**            **Changes have been made to Qwest's Wholesale Markets Web Page URL**
http://www.qwest.com/wholesale/

**Product(s) Impacted:**        **Unbundled Local Loop – General Information**

**Effective Date:**          **May 17, 2002**

Updated information/documentation will be posted to the Wholesale Markets web site that impact Unbundled Local Loop – General Information

This information will be found at URL: http://www.qwest.com/wholesale/pcat/unloop.html

If you do not see the following updates, hit the reload button on your Netscape Navigator, or refresh under view within Internet Explorer.

All updates are consistent with the information available in the Statement of Generally Available Terms (SGAT) URL http://www.qwest.com/about/policy/sgats/

| Section | Sub Section | UPDATE / ACTIVITY |
|---|---|---|
| Product Name | | Unbundled Local Loop – General Information - VDELETE 15 ADD16.0 |
| History Log | | (Link blue text to: "Unbundled Local Loop General Information History Log DELETE V15 04-11-02 ADD V16 06-17-02" download) |
| Pricing | Tariffs, Regulations and Policies | If you submit a request for a 2-Wire or 4-Wire Analog (Voice Grade) Unbundled Local Loop, and the loop is considered secondary service the normal assignment process described above will be followed in its entirety. ADD If facilities can not be located and there is No Planned Engineering Job, your SR will be held for 30 business days. If spare facilities become available, SCIS is prepared and sent back to CLEC to sign off on original SR. If at the conclusion of the 30 business days no facilities are still available, your order will be rejected. Exceptions may apply as mentioned above. If it is determined that facilities are not available, contact your Qwest Service Manager for other options. (Link blue text to: http://www.qwest.com/wholesale/clecs/accountmanagers.html) Information for CLEC requested Unbundled Network Elements (UNE) Construction is available in Qwest's CLEC Requested Unbundled Network Elements (UNE) Construction (CRUNEC). (Link blue text to: http://www.qwest.com/wholesale/clecs/crunec.html)  When you submit an Unbundled Local Loop request for xDSL Services (i.e., 2-Wire or 4-Wire Non-Loaded Loop, ISDN BRI Capable Loop, ADSL Compatible Loop, xDSL-I Capable Loop), or a DS1 Capable Loop or DS3 Capable Loop, the normal assignment process will be followed in its entirety. ADD If facilities can not be located and there is No Planned Engineering Job, your SR will be held for 30 business days. If spare facilities become available, SCIS is prepared and sent back to CLEC to sign off on original SR. |

Att. 17-B

| | | |
|---|---|---|
| | | If at the conclusion of the 30 business day hold facilities are still unavailable, your order will be rejected. Exceptions may occur as mentioned above. If it is determined that facilities are not available, contact your Qwest Service Manager for other options. (Link blue text to: http://www.qwest.com/wholesale/clecs/accountmanagers.html) Information for CLEC requested UNE Construction is available in Qwest's CLEC Requested UNE Construction (CRUNEC). (Link blue text to: http://www.qwest.com/wholesale/clecs/crunec.html) |
| Implementation | Ordering | |

| LSR Field | Must Be Populated With |
|---|---|
| REQTYP | AB FOR Loop only or BB for Loop with LNP |
| ACT | V DELETE or Z |
| LNA | DELETE N ADD V |
| Manual Indicator | Y |
| ECCKT | Circuit Identification of the Private Line |
| DELETE CFA ADD APOT | DELETE Enter CFA information ADD Enter APOT information |
| Remarks | Include in the DELETE remarks Private Line for Unbundled Local Loop pricing conversion ADD remarks Private Line for unbundled local loop pricing conversion CFA information No CO work |

| Implementation | Ordering | The existing Private Line CLCI™ will be changed to an Unbundled Local Loop CLCI™ and is provided to you on your FOC. Once the CLCI™ is assigned, all subsequent design changes will require the Unbundled Local Loop CLCI™, and should be compliant with the design requirements identified in Technical Publication 77384. (Link blue text to: http://www.qwest.com/techpub/77384/77384.pdf) ADD Private Line to unbundled local loop conversion (CLEC) for a read document describing and providing guidance when ordering LSR order information within CA, when there are no provided loops. Private Line conversion. (Link blue text to: http://www.qwest.com/wholesale/training/best_practices.html) |
|---|---|---|
| Implementation | Training | ADD Facility Based CLECs and Reseller Unbundled Network - CLECs Directory Listing (user) Document

There are Qwest facility based competitive local exchange carriers (CLECs) and Reseller unbundled network CLECs. This training document describes Qwest's processes and training objectives which will you established... maintain directory listing information input into Qwest's ... state local service to provide and provide directory listing information... listings that have the existing in Qwest's ... database ... input appropriately. This section will explain to maintain a Qwest customer's ... directory ... published ... and send the directory ... via electronic data ... Your customers ... should review it for ... should be reviewed ... Local Service Provider ... and the ... complete ... information entered info directory ... White Page Directory |

| | | Please click here to learn more about this course and to register. (Link blue text to:
**ADD**
Interconnect Mediated Access (IMA) Directory Listing Training

This course introduces the participant to the IMA functionality as well as the processes that need to be followed to establish, change and/or delete directory listing information. The participant will review the resources available to assist with Directory Listing questions and processes. A significant amount of time will be spent reviewing Qwest listing business rules and how to complete an Ordering and Billing Forum (OBF) Directory Form via IMA. Please click here to learn more about this course and to register. (Link blue text to: http://www.qwest.com/wholesale/training/b-listing.html)

**ADD**
Private Line to Unbundled Loop Racing Conversion – CLEC Job Aid
The purpose of this job aid is to provide guidance in performing LSR Order Form entries for the Private Line to Unbundled Loop Price Conversion. Click here to learn more about this course and to register. (Link blue text to: http://www.qwest.com/wholesale/training/desc-of-job.html)
**ADD**
Unbundled Loop (UBL)
This instructor-led process and systems training course is designed to introduce and teach the Unbundled Loop (UBL) products, instructing CLECs on how to request service for Unbundled Loops. This course will provide an overview of the current UBL product including the Pre-Billing, Order, Post-Order (Provisioning, Billing and CEMR), Maintenance and Repair.
Click here to learn more about this course and to register. (Link blue text to: http://www.qwest.com/wholesale/training/desc-unbundled-loop.html) |

**Question:**

What date was Quick Loop made available?

**Answer:**

Quick Loop was available in Arizona, Colorado, Idaho, Montana, New Mexico, Utah and Wyoming effective February 22, 2001.

Quick Loop was available in Iowa, Nebraska, Minnesota, North Dakota, South Dakota, Oregon and Washington effective April 30, 2001.

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**Question:**

The loop volumes cited in the Loop Affidavit in paragraphs 4 and 72 do not match. Explain.

**Answer:**

Paragraph 72 of the Loop Affidavit reflects the appropriate loop volumes as of March 31, 2001, which is 112,121. Paragraph 4 of the Loop Affidavit inadvertently included loops from Utah. The correct volumes are in paragraph 72.

**Question:**

Provide the location in the Appendix of the last Liberty Audit report regarding OP-4.

**Answer:**

Attached is the Report of the Audit of Changes Affecting OP-3 and OP-4 Application Date and Conditioned Loop Reporting. It is located in Appendix D -- Performance Measures and Results, Tab 16.1.

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# APPLICATION BY QWEST COMMUNICATIONS INTERNATIONAL INC. FOR PROVISION OF IN-REGION, INTERLATA SERVICES IN COLORADO, IDAHO, IOWA, NEBRASKA AND NORTH DAKOTA TABLE OF CONTENTS

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| 6 | Re-Audit of OP-3, -4, -6, and -15 Performance Measures (Measure release date January 11, 2002) |
| 7 | Liberty Re-Audit of BI-1A Performance Measure (Ready-for-release date January 31, 2002 |
| 8 | Liberty Re-Audit of BI-3B and BI-4B Performance Measures (Ready-for-release date February 11, 2002) |
| 9 | PO-19 Stand-Alone Test Environment Accuracy (Measure release date March 6, 2002) |
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Att. 20-A

# Report of the Audit of Changes Affecting OP-3 and OP-4 Application Date and Conditioned Loop Reporting

## A.    Introduction and Background

Liberty audited two changes that Qwest recently made to the reporting of performance. The first was a change to properly set the application date on flow-through orders received after specific cut-off times. The second change involved the determination and reporting of conditioned loop provisioning commitments and intervals.

### Application Date

Qwest made programming changes to more precisely account for the cut-off times for LSRs that are specified in the PID. The reason that a change was required was because orders may have been assigned an incorrect application date when they flowed through the ordering system without manual intervention. In cases where a flow-through order was received after the 3 PM and 7 PM cut-off times specified in the PID for designed and non-designed services, respectively, the application date was earlier than the case of a manually processed order and inconsistent with the PID. The effect of this situation was to calculate the provisioning interval incorrectly for some OP-4 orders.

To accomplish this change, Qwest had to acquire additional information from the Customer Records Management (CRM) system for use in calculating OP-4. This information included the date and time that the LSR was received and an indication of whether the order flowed through the ordering system without manual intervention. Qwest created new fields for RSOR that set a flag for incorporating the logic of which orders could be affected by the issue (e.g., flow-through unbundled loop orders received after 7 PM) and that set the interval for OP-4. The programming was complicated by the fact that certain types of orders (e.g., non-dispatched resale business) consider Saturday a business day while other types of orders do not.

The PID defines the application date and time as the date and time on which Qwest receives from the CLEC a complete and accurate local service request (LSR) or access service request (ASR) or retail order, except that for some orders the application date and time is the start of the next business day. These exceptions are:
- LSRs and ASRs received after 3:00 PM MT for Designed Services
- Retail orders received after 3:00 PM local time for Designed Services
- LSRs received after 7:00 PM MT for POTS Resale (Residence and Business), Non-Design Resale Centrex, non-designed UNE-P, and Unbundled Loops.

### Conditioned Loop Reporting

Qwest first started reporting conditioned loops provisioning commitments met and intervals (OP-3 and OP-4) in September 2001. Liberty did not audit this additional product disaggregation reporting. Qwest's internal analysis of reported results indicated that too many orders were being reported as conditioned loops, and as a result, Qwest temporarily discontinued reporting this product in February 2002. Qwest found that in at least some parts of its region USOC codes for line conditioning activities were being assigned even if line conditioning may not have been required.

To correct this problem, Qwest's reporting systems were made to capture additional data and more specifically identify unbundled and line-share loops that required conditioning. Qwest then began reporting results for this product starting with the April 2002 results that included recalculated results for the period December 2001 through April 2002. Results reporting for conditioned loops affects only OP-3D, OP-3E, OP-4D, and OP-4E.

Qwest's capturing and processing of ordering information identifies conditioned loops in several ways. For example, if a line-share order, which presumably is on a working line, requires dispatch, the order is flagged as conditioning required. Also, information from a system called the Referral Tracking Tool (RTT) is used to identify specific activities associated with conditioning such as removal of bridge taps and load coils. Other identification mechanisms include the use of a jeopardy code that is specific to a local loop requiring conditioning and USOC codes for the non-recurring charges associated with the removal of bridge taps and load coils.

## B.    Overall Summary

No exceptions or observations were identified during Liberty's audit of these changes to Qwest's performance measure reporting. The setting of the application date is consistent with the PID and conditioned loops are accurately reported.

## C.    Analysis

Liberty's review of the application date and conditioned loop changes consisted of reviewing Qwest's responses to Liberty's data requests, interviews with Qwest's regulatory reporting and programming personnel, review of revised SAS code used to implement the changes, and analysis of data files containing records for the month of April 2002.

In reviewing the SAS code, Liberty brought two matters to Qwest's attention that may be improvements but are not necessary to correct problems. Liberty found one part of the RSOR code that may over-specify the unbundled loop orders subject to the 7 PM cutoff time. As written it correctly identifies these orders, but Liberty suggested that Qwest review the code to ensure that only necessary requirements were placed on the identification of these orders. Liberty also noted that Qwest's code may not function properly if two holidays were next to each other. This is not a current or likely problem.

In its review of the data files, Liberty replicated Qwest's reported results for conditioned loops for April in the Qwest region, and in the states of Colorado and Washington.

Liberty noted that both of these changes made Qwest's programming for collecting and processing data for reporting OP measures even more complex. New data sources, new fields, and new logic were added. Liberty did not find any errors or unintended interactions between the new and existing programming. However, Qwest should continue to monitor results and other clues for programming problems.

# D.    Findings and Conclusions

## 1.    Performance Measure Release Date

Liberty completed its audit of the application data and conditioned loop changes on June 7, 2002.

## 2.    Exceptions and Observations

No exceptions or observations have been raised with respect to this audit.

## 3.    Conclusions

The changes discussed above have been properly implemented by Qwest.

## 4.    Recommendations

Liberty has no specific recommendation related to the scope of this audit. However, Liberty notes that the programming required to implement theses changes, as was the cased for the changes reflecting customer due date changes, made performance measure reporting more complex. Therefore, Qwest should continue to monitor and tests its results for problems that may become apparent in the future.